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 7 TO FEDERAL AND/OR LOCAL RULES AND PRACTICES
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9 REFERENCE UPCw P 7.1(d)(1)

10 (Rule Number/Section)

11 **IN THE UNITED STATES DISTRICT COURT**
 12 **FOR THE DISTRICT OF ARIZONA**

JAMES OLIVER ROMINE JR. Plaintiff v. JAMES NICHOLAS STANTON Defendant	Case No.: 2:16-cv-00604-JJT AMENDED COMPLAINT ONE TRIAL BY JURY: No
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17
 18 **COMPLAINT**
 19

20 The Plaintiff, James O. Romine Jr., files this Amended Complaint against
 21 James Nicholas Stanton to The Court as follows:

22 **JURISDICTION AND VENUE**
 23

- 24 1. This case classifies under diversity of citizenship.
 25 2. The Plaintiff, James Oliver Romine Jr is a resident of the State of Arizona and
 26 a Citizen of the United States.
 27 3. The Defendant, James Nicholas Stanton, a United States Person and is

1 currently a resident of Brandon, Mississippi. It is uncertain at this time if The
2 Defendant is a Citizen of the United States.

3 4. The Defendant gains advertising revenue from individuals residing in the State
5 of Arizona. The Defendant also sells merchandise which he profits from in the
6 State of Arizona.

7 5. The Defendant also has a minimum \$1 subscription fee per month from
8 subscribers to The Defendants Patreon.com of which there are almost 4000.

9 These facts instill that The Defendant has personal jurisdiction within the State
10 of Arizona.

11 6. The Defendant's defamatory statements reach into the State of Arizona and
12 have even affected The Plaintiff at his place of previous part time employment
13 where the defamation affected the views of co-workers on The Plaintiff.

14 7. The Defendant advertises his Patreon site through his Youtube and other media
15 outlets which is visible to viewers inside the State of Arizona and this
16 advertisement directly leads viewers to the libelous statements involved in this
17 case.

18 8. Both Patreon.com's usage and Shark Robot LLC's usage as distribution and
19 subscriber based financial instruments within The State of Arizona give cause
20 to personal jurisdiction.

21 9. Damage in excess of \$2 million USD to The Plaintiff has taken place directly
22 in The State of Arizona. Actions taken by The Defendant were aimed at The

1 Plaintiff with the knowledge of The Plaintiff being in Arizona and that those
2 actions would affect The Plaintiff there.

3 10. As shown below, new evidence has surfaced where The Defendant is also a
4 competitor on Steam/The Distributor where The Plaintiff was primarily
5 defamed by the defendant's actions depicted in this complaint. As a member of
6 a development team developing for the Steam PC distribution platform and
7 having now stated prior involvement with other developers in a for profit
8 manner, The Defendant is involved in direct profit from world-wide
9 distribution of pc games competing in the same market as The Plaintiff. These
10 games sell in Arizona and The Defendant has and will profit from sales within
11 Arizona.
12
13

14 11. For the purposes of this Complaint, thejimquisition.com article where portions
15 of the Libel Per Se occurred will be referred to here forward as The Article
16 located at: <http://www.thejimquisition.com/2015/09/digital-homicide-and-the-case-of-the-sockpuppet-developers/> Copy of this article now included as
17
18 Attachment N15.
19
20

21 12. For the purposes of this Complaint, The Defendants twitter feed will be
22 referred to as Tweeted: <https://twitter.com/JimSterling>.
23
24

25 13. The Plaintiff's business partner Steam/Valve Corporation will be referred to
26 here forward as The Distributor.
27
28

PROOF OF REPRESENTATION FOR CAUSES OF ACTION

14. Micro Strategic Designs was a sole proprietor account owned entirely by The
1 Plaintiff. Statements made by The Defendant aimed at DHS, James Romine,
2 and Robert Romine were then associated to Micro Strategic Designs which
3 was a full rebrand where The Plaintiff setup all future business efforts. DHS
4 was never to be used again by The Plaintiff or any member/manager of DHS.
5 The objective of The Article and Tweets by The Defendant was to associate
6 sole proprietor efforts to DHS to continue the harassment, disrupt business, and
7 destroy as much of The Plaintiff's work as possible. Two sections are shown in
8 The Article associating Micro Strategic Designs and The Plaintiff, as the Sole
9 Proprietor, to the events and false accusations that were stated within it. Those
10 two statements are:

15 "The story, of course, doesn't end here. Digital Homicide
16 seemingly has a third sockpuppet company, Micro Strategic
17 Game Designs. MSGD recently got Attrition: Nuclear
18 Domination (<http://store.steampowered.com/app/392870/>)
19 through Steam Greenlight. It looks terrible – obviously – and
20 was recently removed from the Digital Homicide Complete
21 Pack Bundle (<https://steamdb.info/app/392870/history/# =>),
22 demonstrating its link to the infamous studio."

23 And

24 "Speaking of which, Digital Homicide also appears to be
25 behind a new website, BundleBlitz
26 (<http://www.bundleblitz.com/>), a code giveaway site with a
27 special interest in Steam Greenlight hopefuls. BundleBlitz
28 heavily featured Nuclear Attrition recently, though I'm still
 looking into a definitive link."

15. The Attrition: Nuclear Domination game made it entirely through Greenlight

on its own under Micro Strategic Designs Greenlight Account with a 34% vote ratio and 500 yes votes and represented approximately three hundred hours of work and programming over 25000 lines of code.

16. Attachment N1 shows Micro Strategic Designs sole proprietor business Paypal Account where advertising for the lost games was paid for with approximately \$1000.

17. \$50,000 worth of game keys of Attrition nuclear domination were used to advertise the lost games, and when destroyed, that benefit was entirely lost

18. Attachments N2 and N3 show Yahoo pen name support email account Jessy Mattock. This was the support and business email for the sole proprietor Micro Strategic Designs. Over 30 support emails to Micro Strategic Designs customers were sent and received from August 2015 through to October 2015.

19. Attachment N4 shows the Business Paypal account used by The Plaintiff for Micro Strategic Designs as sole proprietor.

20. As can be seen here, The Defendant has stated that “DHS has a third sock puppet” and The Plaintiff’s sole proprietor has been referred to and covered in The Article, and consequently Tweeted, displaying no discernable difference between how The Defendant speaks in regards to the rebranded plaintiff’s soleproprietor Micro Strategic Designs, The Plaintiff, and Digital Homicide. The objective of The Defendant is to associate them all, do damage to them all, and destroy them all.

- 1 21. The orchestrated attack was meant, as can be seen in the article, to stop a
2 rebranding. That rebranding had already been performed at the time of
3 defamation.
- 4
- 5 22. Titles already under Digital Homicide would have remained there and no
6 further use of the Digital Homicide brand was intended.
- 7 23. By The Defendant's actions, purposefully done to cause public outrage, The
8 Plaintiff was forced to continue business under Digital Homicide even though
9 actions had already been taken to separate.
- 10
- 11 **24. As such, all unassociated damages, sole proprietor titles, incurred after**
12 **The Article while forced to be under Digital Homicide should be**
13 **recoverable due to its full destruction in relation to the causes of action**
14 **being realized on September 16th, 2016 for reasons directly associated to**
15 **The Article. See DHS complete destruction in Attachment N13.**
- 16
- 17
- 18

19 **FACTUAL EVENTS IN SUPPORT OF THE CAUSES OF ACTION**

- 20 25. According to 28 U.S. Code § 4101: On September 24th, 2015, When The
21 Defendant falsely accused The Plaintiff and caused damage to reputation,
22 damage to product, loss of product, and causing severe emotional distress to
23 The Plaintiff, The Plaintiff has right to receive restitution for these damages.
24 The statements that have been made on the Internet by The Defendant have
25 resulted in false criticism and condemnation by the public towards The

1 Plaintiff.

2 26. Evidence for all information contained in all line Items 1 through 20 are
3 available even if they have been removed from the Internet at this point.
4

5 27. The Plaintiff took direct damage through the use of his personal name, and the
6 use of the sole proprietor Micro Strategic Designs via multiple postings of false
7 statements in regards to claims of impersonation of ECC Games, a Polish
8 Company based out of an apartment, on twitter.com and thejimquisition.com
9 by The Defendant.

10 28. These false statements first falsely accused DHS and The Plaintiff as a
11 manager and then purposefully associated Micro Strategic Designs sole
12 proprietor and The Plaintiff to DHS to ensure rebranding failure.

13 29. The products and advertising lost to The Plaintiff exceeds \$2 million in market
14 value at the time of damages. The products are listed as Operation: Global
15 Shield, ~~Operation: Vile Strike~~, MAS, Assault on Orion 7, Attrition: Nuclear
16 Domination, Coastal Carnage, Bombing Run, ELT, ~~Grimmehz's Journey~~,
17 Hover Tank Attack, Primate, Starship: Nova Strike, and two pack/bundles that
18 could have been formed with these games, and twenty other titles later lost due
19 to forced association to DHS.

20 30. The products forced removal can be shown on Oct 13th 2015, on
21 greenlightupdates.com which tracks greenlight submissions and removals.
22 ~~Primate was hidden prior to the damages caused and then was forced to be~~
23

1 removed at the same time as the other titles. This cannot be seen on
2 greenlightupdates.com as the item was hidden. See Attachment A.

3 31. These titles were not posted on Digital Homicide Studios LLC's Greenlight
4 Account at the time of The Article and defamation occurring. There were
5 seven greenlight sole proprietor accounts. Four of which were 100% owned by
6 The Plaintiff. Vampier Straud, TheMac, SimplebutFunGames, and Micro
7 Strategic Designs. New plans were in the making to entirely ditch Digital
8 Homicide as a ruined brand due to the Defendant's actions prior to and within
9 The Article. The Defendant had made false statements multiple times about
10 DHS in The Primary video on The Defendant's Youtube Channel with over 2.5
11 million views. For that reason, The Plaintiff had switched off to Micro
12 Strategic Designs for separation of duties and moving away from the DHS
13 brand.

14 32. To organize this complaint more appropriately, all counts of defamation
15 will now be consolidated into three defamation causes of action, one for
16 Tweets posted the day of The Articles posting, one for The Article, and
17 one for the Ask FM statement.

18 33. Civil Conspiracy and Intentional infliction of emotional distress are now
19 displayed in cause of action per the original complaints mention. All
20 previous count elements are now converted to factual events and
21 statements in support of the causes of action listed at the bottom.

1 34. Simplified list of false accusations is stated here:

- 2 a. False accusation of theft of Galactic Hitman image from deviant art and
3 covering up the statement without proper retraction twice. Libel Per Se.
- 4 b. False accusation of theft of Slaughtering Grounds image from deviant
5 art when the art was from a free to use wallpaper site where it had been
6 mistaken for free use over three years ago. The Defendant attempts to
7 associate a pattern of theft by using these two statements together. Libel
8 Per Se.
- 9 c. False accusation of impersonation of another company ECC GAMES
10 SP. Z O.O. when ECC Games acronym for Every Click Counts Games
11 was the trade name being used. These are two entirely different entity
12 types and ECC Poland was using the trading name of Eccentricity. Libel
13 Per Se.
- 14 d. False accusation of defamation of another company. Libel Per Se.
- 15 e. False accusation that The Plaintiff is in legal trouble when no legal
16 trouble exists. Libel Per Se.
- 17 f. False accusation of shady business practices. Libel Per Se.
- 18 g. Accused of illegally, against Distributor terms, using keys for votes
19 which it is specifically not stated that it is not against the terms. Libel
20 Per Se. The Defendant has recently supported another developer,
21 Forever SA, through Greenlight Goodstuff on Youtube, that developer

hands out keys for votes on Greenlight.

- h. False accusation of illegitimately using sole proprietor trade names which are a legal business practice. Libel Per Se.
 - i. Referenced to The Plaintiff as a ‘wet bandit’ or incompetent thief when confidential business information was leaked on a legitimate rebranding attempt so The Defendant could perform the attack. Libel Per Se.
 - j. Defendant claims to ‘know’ all above as if reporting facts when no verification has been attempted. Libel Per Se.
 - k. Defendant claims assets are used in a fashion that portrays the games as if no work is being performed defaming business reputation. Libel Per Se.

35. It is further important to note, that hyperbole and rhetoric are generalized statements. The Defendant's statements shown are false factual allegations that depict an action, a party or parties involved, and a location at which something is being portrayed as happening.

36. Defamation has been so severe on Digital Homicide and The Plaintiff that a vast number of individuals now use DHS name as a branding of poor quality and no work when some titles had from 2000 to 4000 man hours involved.

37. If The Plaintiff puts his name on a Greenlight Account it will be immediately destroyed by harassment due to the defamation of The Plaintiff by The Defendant.

COUNT 1 LIBEL PER SE

38. On September 24th, 2015, The Defendant states “It’s also worth noting that Galactic Hitman’s artwork has been taken from elsewhere, just like the initial art for The Slaughtering Grounds was.” A link is provided to deviant art. The initial Slaughtering Grounds art was not taken from this site. It was a free upload to a wallpaper site and was a derivative work, which when this was discovered that the artist did not have full rights to put it up for free, it was immediately removed. The Article states that The Plaintiff used an image that The Plaintiff did not have rights to (this has happened multiple other times but this is the first time it can be related directly to heavy damages). After the initial burst of tens of thousands views on The Article, The Defendant posted a modification that “maybe” the Plaintiff did not steal it but the damage especially in context with the rest of The Article and can be seen in the comments section. No apology or special attention is given to the retraction. Receipt is included in Attachment B. Image of download is included in Attachment C. The statement is in Attachment D. These false accusations of theft have been going on for over a year. These false accusations and harassment have now destroyed not only DHS and what would have been Micro Strategic Designs but all work The Plaintiff performed for three years. See Attachment N13. Damages are now believed to be far more than original estimations. It is important to emphasize that The Defendant specifically stated

1 The Galactic Hitman image and then the Slaughtering Grounds image as an
 2 attempt to show a history of theft, not just a single action. This false history
 3 being portrayed by The Defendant is based off of two mistakes made by a DHS
 4 partner early on in company effort and that damage was associated to The
 5 Plaintiff on a sole proprietor business effort. Over fifty thousand dollars' worth
 6 of licenses, models, image, and sound has been purchased for use.

7

i. COUNT 2 LIBEL PER SE

8

9 39. On September 24th, 2015, the Defendant states in The Article: "**Here, we've**
 10 **seen it lead to potential legal trouble for the folks who rebranded and**
 11 **accidentally defamed a completely different studio.**" The Defendant claims
 12 The Plaintiff has defamed a studio which is false and tarnishes The Plaintiff's
 13 good name. Every Click Counts, the Trade Name of The Plaintiff was plainly
 14 visible on the developer account since its creation here:

15 <https://steamcommunity.com/profiles/76561198219137364>. That image was
 16 always there even though the acronym was expanded to the full name in the
 17 text. A single click on the account could have verified this information. See
 18 Attachments E and F. In Attachment E, it can be seen that as soon as The
 19 Plaintiff was contacted by ECC Games Poland The Plaintiff changed the name
 20 to be more clear and avoid any confusion this however occurred after
 21 defamatory comments were made and magnified by The Defendant. Defendant
 22 has stated The Plaintiff has 'rebranded' away from DHS further showing

1 attempts to associate The Plaintiff's sole proprietor.

2 i. ~~COUNT 3 LIBEL PER SE~~

3 40. On September 24th, 2015, The Defendant states in The Article "**Apparently**
4 **you don't need to prove your company's legitimacy or even existence,**
5 **since it's all based on usernames.**" This is misleading and is defamatory and
6 portraying false light on The Plaintiff. The Defendant himself is not
7 incorporated in any way that can be found on The Internet. This means The
8 Defendant himself is using Trade Names - Jim Sterling and The Jimquisition.
9 The Defendant makes this statement in a negative way to make it seem to his
10 young audience that normal business practice is somehow being abused. This
11 does significant credibility damage to The Plaintiff in the eyes of the gaming
12 public and peers as these users came and blamed The Plaintiff on active forums
13 on The Distributor's site. See Attachment E.F.

14 i. ~~COUNT 4 LIBEL PER SE~~

15 41. On September 24th, 2015, the Defendant states in The Article: "**It (The Polish**
16 **ECC Games) also has a Twitter account which, prior to now, has no**
17 **history of mentioning either Devil's Share nor Galactic Hitman**" these
18 were the two Games branded under Every Click Counts. At no time did The
19 Plaintiff attempt to imitate ECC Games. There were no links to Polish ECC
20 Games websites, no links to its games, and no use of any of its developers or
21 worker's names. The acronym ECC Games (for Every Click Counts Games)

1 was the only text used in one location on two game pages and once in a video
2 where it is obvious the logo is not the same. ECC Games Poland is using an
3 abbreviation for Eccentricity (which was even shown at the bottom of their
4 webpage until recently deleted) and has no legal business formation in the
5 United States. No contact was attempted to the Plaintiff prior to posting of the
6 defamatory material that caused the damages stated. The material was posted
7 to purposefully cause controversy, damage, and portray The Plaintiff as having
8 done something illegal. The Defendant then took this false information and
9 magnified the damage by a factor of over a two thousand. See Attachment G,
10 now, and Attachment H, previous to January 2016.
11
12

13 *i.* **COUNT 5 LIBEL PER SE**

14
15 42. On September 24th, 2015, the Defendant states in The Article: “That’s not
16 going to happen today though, and its recent chicanery may lead it into very
17 real legal trouble.” see Attachment I. The basis of this statement is false as
18 there was no attempt to impersonate another company. The company
19 supposedly (ECC Games) impersonated is incorporated in Poland and has no
20 legal right to that name in the United States as they are not registered in any
21 US State and have no official Trademark registered with the USPTO. It would
22 have taken 5 years of usage to get onto the secondary register. If ECC Games
23 would have been legally open for usage had The Plaintiff intended on doing so.
24
25 The only record available of an attempt to register was a 2003 ECCEN (An
26
27

1 abbreviation for Eccentricity) posting visible via Trademarkia.com which was
 2 abandoned, Attachment J displays this information. This section struck
 3 through as it was discovered that was not a registration by ECC Games. A
 4 generic Madrid Protocol registration with the same information was registered
 5 as “Roll in the hole” on 2012-10-09. Attachment K displays this information.

6 i. COUNT 6 LIBEL PER SE

7 43. On September 24th, 2015, The Defendant states in The Article: “**Being as sly**
 8 **as the Wet Bandits**” comparing The Plaintiff to an incompetent thief. In
 9 context with the stolen image and wrongdoing of corporate name
 10 impersonation further tarnishes The Plaintiff’s reputation. Please see
 11 Attachment I.

12 i. COUNT 7 LIBEL PER SE

13 44. On September 24th, 2015, The Defendant Tweeted a link to The Article
 14 exposing 122000+ users to false statements: “**I wrote an article on everything**
 15 **we know about the Digital Homicide / ECC Games weirdness.**” The
 16 Defendant states that The Defendant wrote an article then hints at “we”
 17 showing The Defendant is speaking with others on the topic in collaboration.
 18 See Attachment L. Attachment L was apparently missing Adding N14. The
 19 Defendant here states that knowledge within The Article is ‘known’ as fact and
 20 the statement is false as no impersonation, shady business practice, or theft
 21 stated within The Article by The Defendant occurred. The usage of “we”
 22 stated within The Article by The Defendant occurred. The usage of “we”
 23 stated within The Article by The Defendant occurred. The usage of “we”
 24 stated within The Article by The Defendant occurred. The usage of “we”
 25 stated within The Article by The Defendant occurred. The usage of “we”
 26 stated within The Article by The Defendant occurred. The usage of “we”
 27 stated within The Article by The Defendant occurred. The usage of “we”
 28

1 shows collusion and group effort for conspiracy to do the damage that was
2 done. Attachment N14 shows The Defendants statement and a fan having to
3 tell The Defendant the image was for sale on sale on ShutterStock even though
4 The Defendant was told 3 months prior that's where DHS images were being
5 purchased.

6
7 1. **COUNT 8 LIBEL PER SE**
8

9 45. On September 24th, 2015, The Defendant Tweeted: "**According to the email,**
10 **this ECC Games is pursuing legal action against Digital Homicide for**
11 **using its name. Not enough popcorn on Earth.**" This statement shows the
12 false statements as entertainment for The Defendants viewers so that The
13 Defendant can profit from it via view advertisements and subscriber
14 generation. The Defendant's action spread the original defamation from the
15 original ECC Games post from less than a 100 Twitter followers to over 120
16 thousand. The added comment makes it his own and it is restated in
17 thejimquisition.com article The Article. There is no discernible difference
18 between the Plaintiff and Digital Homicide Studios LLC due to continual
19 usage by The Defendant via Youtube videos and articles that use the Plaintiff's
20 good name over the past year. The games lost were under the Every Click
21 Counts Trade Name Micro Strategic Designs representing The Plaintiff
22 directly. See Attachment M. No legal action by ECC Games Poland did or
23 even could take place in regards to the statement. Being associated by The
24

1 Defendant within The Article as Micro Strategic Designs is the link that The
2 Plaintiff claims losses and for all losses thereafter for being forced to do
3 business under Digital Homicide by The Defendant, instead of being able to
4 rebrand.

5
6 46. The Defendant profits from subscribership and ad revenue and is monetarily
7 motivated to provide controversial topics especially about The Plaintiff who
8 has been the target of a larger percentage of the Defendant's materials, more
9 than most of the Triple A multi-million dollar game companies currently
10 subject to The Defendants attacks.

11
12 47. The Plaintiff's Trade Name logo plainly displayed Every Click Counts and it
13 can even be plainly seen in one of the Defendants videos shortly after the
14 defamation occurred. Link for Primate provided:

15
16 https://www.youtube.com/watch?v=_weZ2cXeswA The pasting of the logo is
17 seen now over the thumbnail of the video this was changed with no
18 explanation as to why after a majority of traffic already hit the video and the
19 damage was done. This image was placed there weeks to months after the
20 majority of viewers had already seen the video and shows The Defendant had
21 knowledge that his initial research had not been sufficient and yet offers no
22 retraction. See Attachment N.

23
24 i. **COUNT 9 LIBEL PER SE**

25
26 48. On the 24th of September, 2015, The Defendant Tweeted: "**Jesus Christ, I**

1 just got an email from ECC Games saying they're NOT the ECC Games
2 Digital Homicide named itself after. This is weeeeird." The Defendant is
3 acting shocked here to make it seem as if The Defendant has discovered
4 something - when in fact not enough research has been performed and no
5 attempt to contact The Plaintiff to verify identity or intent has been made. See
6 Attachment O. The Plaintiff legally used a Trade Name and did not imitate
7 a foreign company that had no registered rights in the United States. The Every
8 Click Counts image has been on the developer account since its creation March
9 23rd, 2015. This statement was made two weeks after ECC Games Poland
10 followed The Defendant on Twitter. See Attachment O. Micro Strategic
11 Designs had been its own brand name since June of 2015. See Attachment N12
12 displaying the game Attritions launch window which has been there since
13 August 7 2015 the date the game launched. The MSD brand name can also be
14 seen in The Defendant's article where The Defendant links the game to Digital
15 Homicide.

16 49. Three days after almost destroying The Plaintiff, The Defendant finally asks
17 his subscribers to stop harassing others when my partner had asked him to do
18 this three months prior. The Defendant essentially posts his material the
19 viewers see it and immediately form a riot/witch hunt where they go and attack
20 the particular products store page. See Attachment Q. This attachment
21 contains a false accusation of DHS being Xenobyte Studios impersonators

which was blamed on The Plaintiff over a hundred times after its posting.

50. For a period over a year and a half, The Defendant has directed harassing subscribers and viewers of his media outlets towards The Plaintiff's store pages. The Plaintiff has over two ~~hundred~~ thousand screenshots and 1000 emails showing these harassing and damaging statements many of them include accusations of theft and illegal action although The Plaintiff has not done any such thing. Tens of thousands of posts are involved. Many of these subscribers are in fact other developers who have motives to harass and stop the Plaintiff from doing business. The Defendant acts as a funnel for these competitors providing them with extra harassment support to destroy products on The Distributor's site. The Plaintiff rebranded to Micro Strategic Designs in an effort to avoid harassment and was internally outed by individuals inside The Distributor even though they fully knew The Plaintiff would be using Trade Names. Dozens if not hundreds of other companies and individuals use different trade names to do business on The Distributor's site, similar to Amazon, Ebay, and thousands of other online websites.

51. The statements of “**might lead it into very real legal trouble**” and “**potential legal trouble**” by The Defendant in The Article and Tweet that caused the Skype conversation between the Plaintiff and The Distributor. The Defendant makes all the accusing statements with the intent of depicting The Plaintiff in a malicious and defamatory manner, in reckless disregard for truth, and with

1 negligence of not performing proper research before accusation. The Article
2 convinces the public and The Distributor that The Plaintiff is guilty of multiple
3 false accusations.
4

5 52. During the Skype conversation on October 13 2015 with The Distributor
6 representatives Conor Malone and Tom Giardino, The Plaintiff was told that
7 The Distributor was going to stop doing business with the Plaintiff. All of the
8 Plaintiff's games were to be removed from sale. The Plaintiff managed to
9 convince The Steam Representative, Tom, that The Plaintiff had not done
10 anything illegal and The Plaintiff was a victim of false statements. Tom
11 Giardino and Conor Malone had disabled the Plaintiff's developer account and
12 were in the process of removing all of the Plaintiff's products which would
13 destroy all of the Plaintiff's income when the Plaintiff begged The Distributor
14 not to delete the Plaintiff's income and that the Plaintiff would give all of the
15 Plaintiff's current sole proprietor future products on Greenlight up to avoid
16 losing everything. Tom Giardino accepted this sacrifice. This sacrifice was
17 made under extreme duress as The Plaintiff was about to lose over six
18 thousand hours of coding and model work, all of The Plaintiff's income, and
19 suffer extreme damage in the eyes of the public to the point of being unable to
20 do business under The Plaintiff's good name. See Attachment XX. The
21 Plaintiff has now been singled out as not being able to work under other
22 companies, ie sole proprietors; and not being able to use keys to generate
23
24
25
26
27
28

1 traffic (a very common practice). The Game Suits gave away 25000 keys to
2 generate traffic a week prior to the Skype conversation and was greenlit the
3 day of the Skype conversation.
4

5 53. Many of the The Defendant's subscribers are fanatical, young, and
6 impressionable. They are easy to mislead and The Defendant specifically states
7 on Youtube that he knows he can do so at time 15:30 to 16:00 minutes into the
8 video The Defendant States: "But if there is one thing I have learned about
9 game journalism, it's that you can pretty much say anything about anything,
10 and ah, people will swallow it, you just ascribe some sort of artistic meaning
11 to things, whether that was the intention or not, someone will believe you."
12
13

14 <https://www.youtube.com/watch?v=Wa02mXimzqk>.

15 i. ~~COUNT 10 LIBEL PER SE~~

16 54. The date of this comment cannot be seen as it has now been deleted. Evidence
17 was saved in a screenshot. On The Defendant's ask.fm/jimquisition channel,
18 The Defendant states "**Yeah it was, because Digital Homicide is more than**
19 **just a bad developer. It's had a history of shady and dishonest behavior,**
20 **behavior it was continuing under its new name. The very fact it was**
21 **damaging the reputation of another company is entirely bad enough, to**
22 **say nothing of its continued efforts to push games through Greenlight via**
23 **unscrupulous means. I will not deny the pleasure I take in sticking it to**
24 **them, but their name is mud for a reason, and people deserve to know**
25
26
27

1 **who's really selling them products.”** This statement assists in defining the
2 intent of The Defendant. This statement has been deleted from
3 ask.fm/jimquisition channel sometime between December 2015 and January
4 2015 over 3 months after it was posted. The Plaintiff’s ‘name being mud’ is
5 only through The Defendant’s repeated videos, articles, and statements on
6 Twitter. These statements continually magnified minor user problems that
7 every Steam Developer has and turned them into an all-out barrage of attacks.
8 The ‘shady behavior’ is referring to Keys for votes, the day The Plaintiff was
9 almost Destroyed by The Defendants Twitter and Article statements a game
10 called “Suits” was admitted through greenlight having given 25000 keys away
11 for votes just a week prior. The Defendant’s ‘shady behavior’ statement is also
12 The Plaintiff simply attempting to rebrand to avoid harassment caused by The
13 Defendants media outlets. The statement that The Plaintiff is damaging the
14 reputation of another company is false and maliciously negligent without
15 regard for the truth. Deletion of the comment shows intent to cover the facts of
16 the aggressive act without any regard for the damage it has done. Screenshot
17 image is included in attachment R. **The harassers and The Defendant**
18 **attacked The Plaintiff repeatedly forcing The Plaintiff to attempt to**
19 **rebrand and then The Plaintiff was made to look as if doing something**
20 **illegal when doing so just to try to work in peace.** All products can be
21 refunded if the customer is not satisfied. Every product under 3 dollars with
22
23
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1 most being a dollar. A majority go on sale for less than .50 cents. Cost of
2 ownership is extremely low. Quality is decent with play time varying from 1 to
3 250 hours per user.
4

5 55. Attachment Y is not the responsibility of The Defendant directly. It is a prime
6 physical example of the + 40 thousand plus posts of hate generated due to the
7 defamation spawning from the Defendant's actions. It is a picture of a bag of
8 feces received by mail four weeks prior to this case filing. The Plaintiff expects
9 the problem to get worse regardless of whether or not this case is pursued as
10 The Plaintiff believes all damage is not recoverable.

11 **COMPETITOR AND HARASSMENT FACTS**
12

13 56. With a single video or article, The Defendant can unleash a barrage of
14 harassment, or a barrage of support for a particular product. While criticism is
15 an expected part of the industry, harassment is not. See Attachment N11
16 showing The Defendant's knowledge of harassment instigated by The
17 Defendant's videos and articles. The Defendant specifically states The Plaintiff
18 is not worthy of not being harassed.

19 57. In Attachment N11, The Defendant specifically states a developer's family had
20 to beg The Defendant to take his video down because of the harassment
21 ensuing on their family members game. The Defendant then states DH did not
22 take a reasonable approach by doing a DMCA of content owned by The
23 Plaintiff showing that The Defendant had knowledge that the DMCA was
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1 for harassment NOT for criticism as The Defendant stated in the main video
2 on his channel with 2400000 views. The Defendant expects developers to
3 suffer the initial harassment, while using their content, and then beg for
4 removal of a damaging video instigating that harassment. See Attachment N5.

5 58. The Defendant then states the content will eventually be removed. See
6 Attachment N11. This shows direct knowledge of The Defendant that his
7 video/product will induce harassment, and eventually destroy the product
8 before it reaches market and the Defendant does so as a competitor in the very
9 same market.

10 59. Shown also in Attachment N6, The Defendant shows ‘cleanlight hq’ and
11 “Steam Cleaner” showing intent and location to organize to attack targeted
12 products. These references are to the usage of videos to generate harassment on
13 Greenlight which forces the removal of products before they can reach market
14 and The Defendant does so as a competitor, continually interfering with
15 business. Several thousand screenshot examples of this can be provided upon
16 request including one set of 50 images showing from 10-20 posts a minute
17 attacking a developer other than The Plaintiff that was the target of a video of
18 The Defendant.

19 60. The Defendant has acknowledged, as a byproduct of his creations, that his
20 targets – competitors - are harassed. The Plaintiff has been targeted repeatedly
21 both under DHS and outside of that company name. Micro Strategic Designs

1 was directly attacked, SimplebutFunGames, and The Mac were also attacked in
2 video shortly after The Article resulting in having to first hide from harassment
3 and then remove those products.

4 61. On November 28th, 2016, The Defendant revealed being a direct market
5 competitor as shown in N7, N8, and N9 while using the very media outlets
6 boosted by destroying The Plaintiff's reputation to advertise a game in the
7 exact same market place and a kickstarter to fund it for \$55,000. Prior
8 competitor profiting by The Defendant was discovered upon The Defendant
9 showing this and through a video shortly after this. The Defendant uses the
10 same media outlets to destroy competitors attempting to enter the market as he
11 pushes his own products onto the same market. Note that in N7 PC is shown –
12 not Steam. In N8 is shown Steam and not PC. Steam/PC *is* The Distributor
13 as far as PC games goes. There is nowhere else to significantly sell them. Even
14 Microsoft has stated they will be selling more on The Distributor.

15 62. Due to the Defendant being a competitor, The Plaintiff may joinder further
16 causes of action against The Defendant which are currently under debate on
17 whether to be filed.

18 63. The Article was used by The Defendant to force Operation Global Shield,
19 Attrition Nuclear Domination, ELT, Bombing Run: Heavy Fire, Mini Attack
20 Sub, and Coastal Carnage back under DHS after rebranding under Micro
21 Strategic Designs had already been performed. This was a forced action by The

1 Article and defamation which created the duress and forced The Plaintiff to
2 reverse being rebranded. Operation Global Shield was added as it was entirely
3 sole proprietor on Micro Strategic Designs greenlight. Operation Global Shield
4 had \$200 of the advertisement from Micro Strategic Designs paypal dedicated
5 to an advertisement for the rebranding.

64. For statistical data regarding interest in The Defendant see Attachment N10.

7 Spike A is the initial filing of this case. Spike B is three videos by The
8 Defendant on a game (No Man's Sky) that made in excess of \$80 million in
9 sales and was one of the top sellers on The Distributor for 2016. Spike C is the
10 complete destruction of Digital Homicide Studios due to harassment and
11 defamation issues heavily contributed to by The Defendant.

15. Attachments U and V are examples of another game that a developer was
16 attacked due to videos by The Defendant. Within hours hundreds of non-game
17 owners posted repeatedly attacking the game and its creator. This same
18 problem was suffered by all DHS games and all DHS and sole proprietor
19 greenlights. The Defendant's videos were a form of rally call to attack.

21 **STATEMENT OF CLAIM**

23 **FIRST CAUSE OF ACTION: TORT OF DEFAMATION**

24 **(Libel Per Se Based upon Defendant's false statements within The Article)**

25 66. Plaintiff realleges and incorporates all above paragraphs.

26 67. On September 24th 2015, The Defendant made false and defaming statements

1 in regards to Micro Strategic Designs and The Plaintiff. Within The Article
2 The Defendant directly associates DHS to Micro Strategic Designs, a sole
3 proprietor of The Plaintiff and directly representing the game Operation Global
4 Shield, Attrition: Nuclear Domination, ELT, Bombing Run: Heavy Fire, Mini
5 Attack Sub, and Coastal Carnage. These false statements include accusation of
6 theft, shady business practices, inferior product value affecting business
7 reputation, false impersonation of a company that had no legal right to the
8 name in the United States. Micro Strategic Designs was, in fact, not Digital
9 Homicide Studios. Micro Strategic Designs was only run by The Plaintiff as a
10 sole proprietor. The Defendant's portrayal in The Article pulls The Plaintiff
11 under sole proprietor into a host of false statements and accusations then
12 forcing The Plaintiff, under duress, to stop rebranding and be forced back
13 under the DHS brand for future harassment and public attack by The
14 Defendant.

- 15 68. Minimum adjusted losses directly representable by The Plaintiff \$300,000 for
16 6 sole proprietor titles over five years at time of loss.
17
18 69. \$1000 of lost advertisement money in direct relation to Micro Strategic
19 Designs, The Plaintiff's sole proprietor.
20
21 70. \$50,000 in lost key advertisement from Attrition Nuclear Domination a game
22 entirely owned by Micro Strategic Designs and The Plaintiff.
23
24 71. If being referred to as Digital Homicide when under Sole Proprietor and/or

1 being forced to do business under DHS after the Article is deemed recoverable
 2 by The Court for loss for all work forced done under DHS through duress after
 3 the publishing of The Article for a total of 20 unassociated games at \$10,000
 4 per game per year for 5 years for a total of \$1,000,000 and \$500,000 for loss of
 5 access to keys for over four months during critical market time stopping all
 6 advancement in the marketplace.

72. Reputational losses estimated at being unable to use The Plaintiff's name to do
 73 business in PC gaming ever in the future again The Plaintiff claims \$4,000,000
 74 in damages.

75. Whatever damages The Court sees fit including exemplary, punitive, and
 76 compensatory.

SECOND CAUSE OF ACTION: TORT OF DEFAMATION

(Libel Per Se Based upon Defendant's false statements on Twitter)

74. Plaintiff realleges and incorporates all above paragraphs.

75. On September 24th 2015, The Defendant made false and defaming statements
 76 in regards to Sole Proprietor Micro Strategic Designs and The Plaintiff. The
 77 Defendant Tweeted and directly associates DHS to Micro Strategic Designs, a
 78 sole proprietor of The Plaintiff and directly representing the game Operation
 Global Shield, Attrition: Nuclear Domination, ELT, Bombing Run: Heavy
 Fire, Mini Attack Sub, and Coastal Carnage. These false statements include
 accusation of theft, shady business practices, inferior product value affecting

1 business reputation, false impersonation of a company that had no legal right to
2 the name in the United States. Micro Strategic Designs was, in fact, not Digital
3 Homicide Studios. Micro Strategic Designs was only run by The Plaintiff as a
4 sole proprietor. The Defendant's portrayal in The Article pulls The Plaintiff
5 under sole proprietor into a host of false statements and accusations then
6 forcing The Plaintiff, under duress, to stop rebranding and be forced back
7 under the DHS brand for future harassment and public attack by The
8 Defendant.

11 76. Minimum adjusted losses directly representable by The Plaintiff \$300,000 for
12 6 sole proprietor titles over five years at time of loss.

14 77. \$1000 of lost advertisement money in direct relation to Micro Strategic
15 Designs, The Plaintiff's sole proprietor.

16 78. \$50,000 in lost key advertisement from Attrition Nuclear Domination a game
17 entirely owned by Micro Strategic Designs and The Plaintiff.

19 79. If being referred to as Digital Homicide when under Sole Proprietor and/or
20 being forced to do business under DHS after the Article is deemed recoverable
21 by The Court for loss for all work forced done under DHS through duress after
22 the publishing of The Article for a total of 20 unassociated games at \$10,000
23 per game per year for 5 years for a total of \$1,000,000 and \$500,000 for loss of
24 access to keys for over four months during critical market time stopping all
25 advancement in the marketplace.

- 1 80. Reputational losses estimated at being unable to use The Plaintiff's name to do
2 business in PC gaming ever in the future again The Plaintiff claims \$4,000,000
3 in damages.
- 4 81. Whatever damages The Court sees fit including exemplary, punitive, and
5 compensatory.

7 **THIRD CAUSE OF ACTION: TORT OF DEFAMATION**

8 **(Libel Per Se Based upon Defendant's false statements on ASK.FM)**

- 10 82. Plaintiff realleges and incorporates all above paragraphs.
- 11 83. On September 24th 2015, The Defendant made false and defaming statements
12 in regards to Sole Proprietor Micro Strategic Designs and The Plaintiff. The
13 Defendant made the choice of posting a comment discussing a fans ECC
14 Games question.
- 16 84. Within that statement The Defendant states that DHS and consequently MSD
17 has defamed Polish ECC Games, has shady business practices, and pushing
18 games to market through unscrupulous means that are actually common place.
- 20 85. The Defendant directly associates Micro Strategic Designs, a sole proprietor of
21 The Plaintiff and directly representing the game Operation Global Shield,
22 Attrition: Nuclear Domination, ELT, Bombing Run: Heavy Fire, Mini Attack
23 Sub, and Coastal Carnage. The Defendant's statement on Ask.fm pulls The
24 Plaintiff under sole proprietor into a host of false statements and accusations
25 then forcing The Plaintiff, under duress, to stop rebranding and be forced back

1 under the DHS brand for future harassment and public attack by The
2 Defendant.

3 86. Minimum adjusted losses directly representable by The Plaintiff \$300,000 for
4 6 sole proprietor titles over five years at time of loss.

5 87. \$1000 of lost advertisement money in direct relation to Micro Strategic
6 Designs, The Plaintiff's sole proprietor.

7 88. \$50,000 in lost key advertisement from Attrition Nuclear Domination a game
8 entirely owned by Micro Strategic Designs and The Plaintiff.

9 89. If being referred to as Digital Homicide when under Sole Proprietor and/or
10 being forced to do business under DHS after the Article is deemed recoverable
11 by The Court for loss for all work forced done under DHS through duress after
12 the publishing of The Article for a total of 20 unassociated games at \$10,000
13 per game per year for 5 years for a total of \$1,000,000 and \$500,000 for loss of
14 access to keys for over four months during critical market time stopping all
15 advancement in the marketplace.

16 90. Reputational losses estimated at being unable to use The Plaintiff's name to do
17 business in PC gaming ever in the future again The Plaintiff claims \$4,000,000
18 in damages.

19 91. Whatever damages The Court sees fit including exemplary, punitive, and
20 compensatory.

21 **FOURTH CAUSE OF ACTION: CIVIL CONSPIRACY**

(Through Defendant's conspiring with others)

92. Plaintiff realleges and incorporates all above paragraphs.

93. For conspiring with ECC Games of Poland members, Members within the Steam Community, and Members of The Plaintiffs business partner Valve (The Distributor), the Plaintiff claims civil conspiracy charges on actions that have damaged The Plaintiff. Had proper due diligence, and due care been performed by The Defendant, The Defendant could have properly investigated all information posted before causing damage and instead communicated with, conspired, and relied upon unreliable sources due to negligence, malicious intent, and sheer hatred of The Plaintiff.

94. Throwing caution to the wind with ill intent in mind, The Defendant has conspired and organized with others with the afore mentioned actions to destroy and ruin The Plaintiff. All conspirators are aware of the attempted rebranding of The Plaintiff and have no mistakes as to who The Plaintiff is.

95. The Defendant conspired at least 24 hours in advance of publication of false statements and made no efforts to contact The Plaintiff or verify information.

96. The Plaintiff claims \$75,000 in damages and whatever The Court sees fit
including exemplary, punitive, and compensatory damages.

FIFTH CAUSE OF ACTION:

INTENTIONAL INFILCTION OF EMOTIONAL DISTRESS

97 Plaintiff realleges and incorporates all above paragraphs.

98. The Plaintiff brings cause of action for intentional infliction of emotional, mental, and financial distress upon The Defendant for the actions depicted within this amended complaint. The Defendant has performed repeated actions and statements in attempts to disable, ruin, and destroy The Plaintiff. Those actions and statements have in fact now destroyed The Plaintiff.

99. For knowingly and intentionally performing defamatory and harassing actions
The Plaintiff claims \$3,000,000 for the losses of quality of life, mental anguish,
emotional anguish, by the actions performed by The Defendant. The
Defendant's actions spread to tens of thousands of users who mimicked his
actions and then hundreds of others made videos to make ad revenue while
repeating The Defendant's false and harassing statements.

100. The Plaintiff also claims whatever other damages The Court sees fit
including exemplary, punitive, and compensatory damages.

PRAYER FOR RELIEF

If the court finds in favor of The Plaintiff for the causes of action against The Defendant,
The Plaintiff requests:

For Damages in regards to The Tort of Defamation for malicious, false, and misleading statements within The Article and Tweeted by The Defendant;

In Regards to loss of reputation: \$4,000,000

In Regards to loss of product under sole proprietor: \$300,000

In Regards to loss of sole proprietor products forced under DHS brand: \$1,500,000

1 In Regards to loss of advertisement investment: \$51,000

2 Total Defamatory Damages: \$5,851,000

3 \$75,000 for civil conspiracy to cause damage, for being the primary instigator and causer
4 of damage, and for conspiring with others for information and co-action to cause damage.

5 \$3,000,000 and whatever other damages The Court sees fit including exemplary,
6 punitive, and compensory damages for the cause of action of intentional infliction of
7 emotional distress.

8 \$400,000 in time and costs of learning, filing, and bringing these causes of action.

9
10 The Plaintiff prays for a minimum of \$6,000,000 in punitive damages for damages The
11 Defendant has done, is doing, and continues to do to others in a similar fashion to The
12 Plaintiff.

13
14 Total Relief Request: \$15,326,000 and whatever other compensation The Court finds just
15 and fair.

16
17
18 If the court finds in favor of The Plaintiff in the Complaint of Defamation via Libel Per
19 Se the Plaintiff requests the following judgement for the Libel Per Se causes of action
20 mentioned there in reference to both the Plaintiff's good name, the Plaintiff's business
21 practice, and its damage in the eyes of consumers, for damage spread through other
22 Youtubers, and writers following in the Defendant's lead. For emotional and financial
23 distress, pain and suffering, and abuse at the hands of The Defendant's subscribers
24 magnified by the false statements depicted in this case:

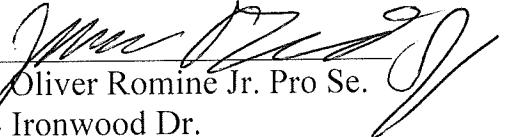
- 1 ● Full reimbursement for 5 years of lost product value at the per game value at time
2 of loss: \$19,000 per product at 12 products for 5 years = \$1,140,000.
- 3 ● Half reimbursement for trailing depreciating product value for the 5th to 10th
4 years of product life: \$9,500 per product at 9 products for 5 years = \$570,000.
- 5 ● Loss of \$1000 in advertising and 50,000 keys used to advertise the lost products
6 these were current products that now these individuals will never purchase.
7 \$51,000.
- 8 ● Emotional and financial distress including extreme financial strife resulting in loss
9 of quality of life, loss of time to visit with family, immediately upon libel striking:
10 \$500,000.
- 11 ● Long term costs of time and effort to recover The Plaintiff's name and deal with
12 defamation locations across the net for the rest of The Plaintiff's life. \$3,000,000
13 \$75,000 and whatever The Court sees fit to award.
- 14 ● Time loss dealing with this case and research involved including the almost 1500
15 thousand hours the Plaintiff spent performing research on law to represent
16 appropriately in court (this reduced game production output by a minimum of five
17 titles putting the Plaintiff in a worse financial position). \$800,000.
- 18 ● Currently it has been demanded by The Distributor due to the damage caused that
19 is presented in this case that The Plaintiff cannot rebrand in an attempt to get out
20 from under this defamation. Unless this can be reversed all future titles will
21 suffer at an impossible to calculate amount in the definite millions to tens of

1 ~~millions in future losses as the Plaintiff's skillset has and continues to increase~~
 2 ~~significantly.~~ Minimum reasonable value is \$5 million as The Distributor is the
 3 prime outlet for PC games ~~with in excess of 80% of PC digital distribution market.~~
 4 If after this case is over, Steam will allow The Plaintiff to rebrand then this
 5 damage can be considered half as there will always be the possibility that The
 6 Distributor who has a virtual monopoly over the PC game market may have a fan
 7 of The Defendant in its midst that can do damage to The Plaintiff. ~~Plaintiff has~~
 8 ~~now been completely destroyed by defamation effects heavily contributed to by~~
 9 ~~The Defendant.~~

- 12 ● ~~Punitive damages in the amount of \$10 million to discourage The Defendant, and~~
 13 ~~all others that followed suit with The Defendants actions, from performing similar~~
 14 ~~actions in the future. A minimum of 20 other former victims such as The Plaintiff~~
 15 ~~have been singled out and destroyed for profit in a manner which replaces their~~
 16 ~~copyright created material with a video from The Defendant while using the~~
 17 ~~target's content.~~
- 19 ● ~~OR The removal of all media outlets and court order for The Defendant never to~~
 20 ~~participate in Game journalism, Let's plays, or any other media outlet game based~~
 21 ~~Internet material again any time in the future and \$1,000,000 from The Defendant~~
 22 ~~or available insurance policy.~~

25 Dated this 12 day of February 2016
 26 James Oliver Romine Jr.
 27 12494 Ironwood Dr.
 28 Yuma, Arizona 85367

1
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5
6
7
8
9
RESPECTFULLY SUBMITTED this Day 2 of February 2017

10 By: 
11 James Oliver Romine Jr. Pro Se.
12 12494 Ironwood Dr.
13 Yuma, Arizona 85367
14 jromine2445@gmail.com
15 928-276-1844

16
17
18
19
CERTIFICATE OF SERVICE

20 I hereby certify that on February 2nd, 2017, I caused the
21 foregoing document to be filed with the Clerk of Court
22 by mail which will notify the below recipient through
23 CM/ECF System transmittal of Notice to the following
24 CM/ECF registrant:

25
26 HARTMAN TITUS PLC
27 Bradley P. Hartman
28 John D. Titus
14 7114 E. Stetson Drive, Suite 205
15 Scottsdale, Arizona 85251-3250
16 *Attorneys for Defendant*

17
18
19
20 /s/James Oliver Romine Jr. Pro Se.

James Oliver Romine Jr. Pro Se Litigant
 12494 Ironwood Dr.
 Yuma, Arizona 85367
 928-276-1844
 jromine2445@gmail.com

**IN THE UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF ARIZONA**

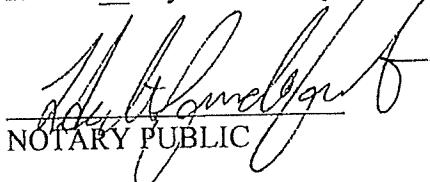
JAMES OLIVER ROMINE JR. Plaintiff v. JAMES NICHOLAS STANTON Defendant	Case No.: AFFIDAVIT OF VERIFICATION TRIAL BY JURY: No
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I James Oliver Romine Jr, depose and state that Attachment A is true and correct to the best of my knowledge, information, and belief and in support of the factual allegations contained within The Complaint.

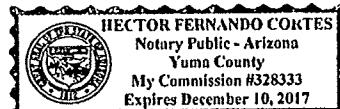


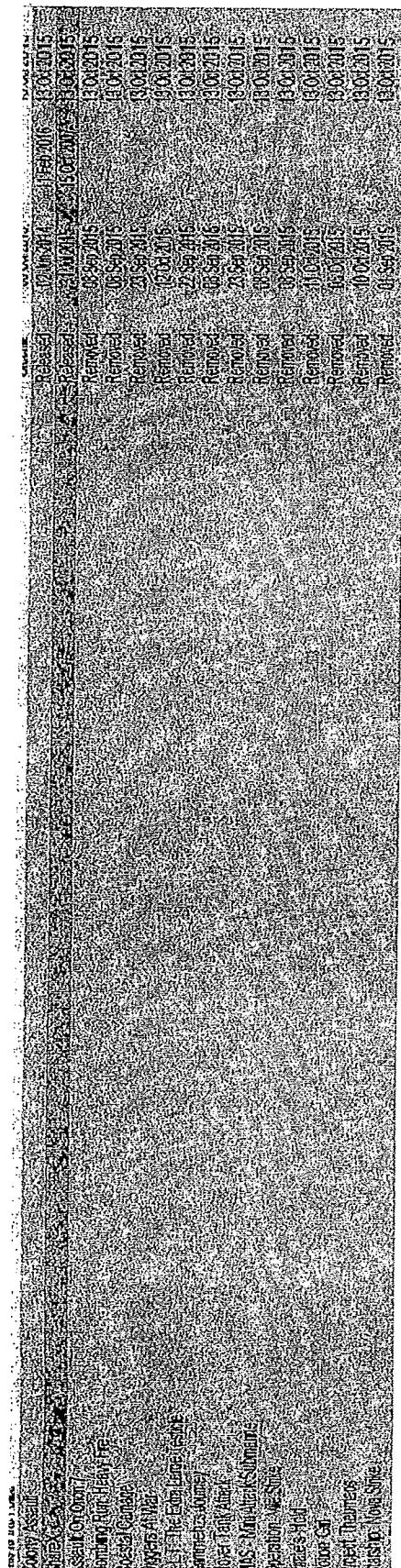
Dated this 12 day of February 2016
 James Oliver Romine Jr.
 12494 Ironwood Dr.
 Yuma, Arizona 85367

Sworn to and subscribed before
 me this 22 day of February 2016.



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Attachment A

Case 2:16-cv-00604-JJT Document 1 Filed 03/04/16 Page 3 of 36

James Oliver Romine Jr. Pro Se Litigant
 12494 Ironwood Dr.
 Yuma, Arizona 85367
 928-276-1844
 jromine2445@gmail.com

**IN THE UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF ARIZONA**

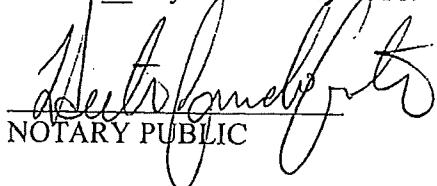
JAMES OLIVER ROMINE JR. Plaintiff v. JAMES NICHOLAS STANTON Defendant	Case No.: AFFIDAVIT OF VERIFICATION TRIAL BY JURY: No
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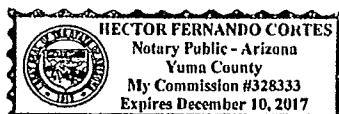
I James Oliver Romine Jr, depose and state that Attachment B is true and correct to the best of my knowledge, information, and belief and in support of the factual allegations contained within The Complaint.



Dated this 22nd day of February 2016
 James Oliver Romine Jr.
 12494 Ironwood Dr.
 Yuma, Arizona 85367

Sworn to and subscribed before
 me this 22nd day of February 2016.


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shutterstock

THANK YOU!

Your payment has been received.

You now have download access across our entire collection of photos, vectors, illustrations, and more.

Date of Purchase: 7/18/2015

Order summary:

30-day Subscription, Standard License with 350 Downloads per Month. \$169.00

Billed to:

Robert romine

Payment Method: Credit Card

Credit Card ending in: 8595

12494 Ironwood dr.

Yuma, AZ 85367

United States

Total:

\$169.00

Your credit card will be charged from
'SHUTTERSTOCK.COM'

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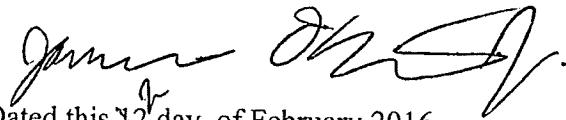
Attachment B

Jámes Oliver Romine Jr. Pro Se Litigant
 12494 Ironwood Dr.
 Yuma, Arizona 85367
 928-276-1844
 jromine2445@gmail.com

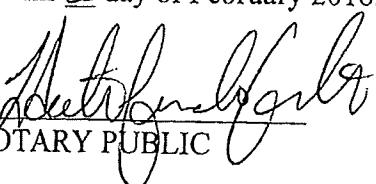
**IN THE UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF ARIZONA**

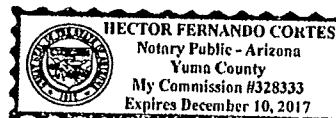
JAMES OLIVER ROMINE JR. Plaintiff v. JAMES NICHOLAS STANTON Defendant	Case No.: AFFIDAVIT OF VERIFICATION TRIAL BY JURY: No
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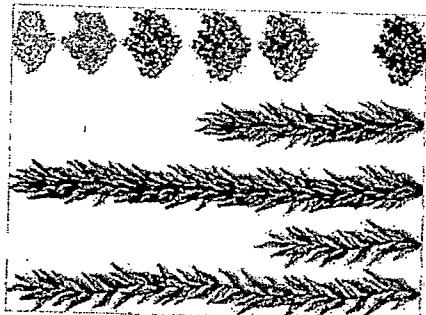
I James Oliver Romine Jr, depose and state that Attachment C is true and correct to the best of my knowledge, information, and belief and in support of the factual allegations contained within The Complaint.


 Dated this 22 day of February 2016
 James Oliver Romine Jr.
 12494 Ironwood Dr.
 Yuma, Arizona 85367

Sworn to and subscribed before
 me this 22nd day of February 2016.


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9/2/15

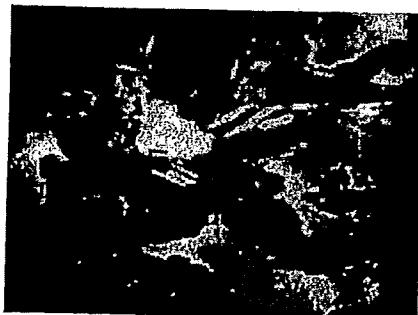
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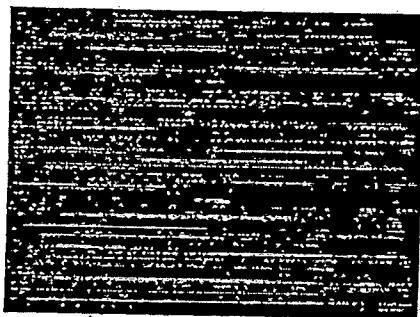
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9/4/15

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9/4/15

Standard License

Attachment C

Case 2:16-cv-00604-JJT Document 1 Filed 03/04/16 Page 7 of 36

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 jromine2445@gmail.com

**IN THE UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF ARIZONA**

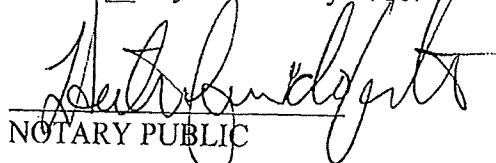
JAMES OLIVER ROMINE JR. Plaintiff v. JAMES NICHOLAS STANTON Defendant	Case No.: AFFIDAVIT OF VERIFICATION TRIAL BY JURY: No
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I James Oliver Romine Jr, depose and state that Attachment D is true and correct to the best of my knowledge, information, and belief and in support of the factual allegations contained within The Complaint.

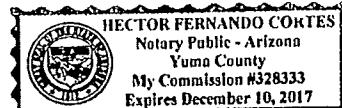


Dated this 22nd day of February 2016
 James Oliver Romine Jr.
 12494 Ironwood Dr.
 Yuma, Arizona 85367

Sworn to and subscribed before
 me this 22nd day of February 2016.



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Case 2:16-cv-00604-JJT Document 4-1 Filed 03/04/16 Page 8 of 36

You can watch video footage of *Devil's Share* and *Galactic Hitman* by clicking those prior links – they carry all the classic hallmarks of a Digital Homicide production. The assets are all store-bought, they're both hideous to look at, interactively generic, unfinished, and broken in some significant way. The only difference is the rebranding of the developer – surely a response to the fact that James and Robert Romino know their prior company's name is mud on Steam these days.

It's also worth noting that *Galactic Hitman*'s artwork has been taken from elsewhere, just like the initial art for *The Slaughtering Grounds* was. You can see the original imagery here, which Faker-ECC may have purchased from Shutterstock. Does DH even *have* a single artist?

[**Note:** Initially I suggested Digital Homicide just took the image from a Deviantart artist without permission, not knowing it was also sold on Shutterstock. The text has been edited to reflect this.]

Case 2:16-cv-00604-JJT Document 1-1 Filed 03/04/16 Page 9 of 36

James Oliver Romine Jr. Pro Se Litigant
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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

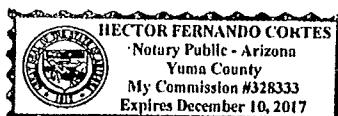
<p>JAMES OLIVER ROMINE JR.</p> <p>Plaintiff</p> <p>v.</p> <p>JAMES NICHOLAS STANTON</p> <p>Defendant</p>	<p>Case No.:</p> <p>AFFIDAVIT OF VERIFICATION</p> <p>TRIAL BY JURY: No</p>
--	---

I James Oliver Romine Jr, depose and state that Attachment E is true and correct to the best of my knowledge, information, and belief and in support of the factual allegations contained within The Complaint.

James Oliver Romine Jr.
Dated this 12 day of February 2016
James Oliver Romine Jr.
12494 Ironwood Dr.
Yuma, Arizona 85367

Sworn to and subscribed before
me this 22nd day of February 2016.

M. Thompson
NOTARY PUBLIC





Case 2:16-cv-00604-JJT Document 1-1 Filed 03/04/16 Page 11 of 36

James Oliver Romine Jr. Pro Se Litigant
 12494 Ironwood Dr.
 Yuma, Arizona 85367
 928-276-1844
 jromine2445@gmail.com

**IN THE UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF ARIZONA**

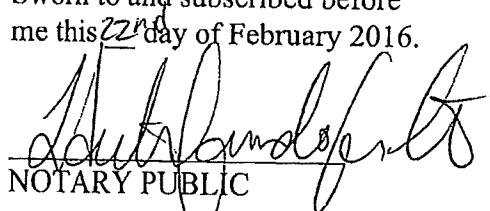
JAMES OLIVER ROMINE JR. Plaintiff v. JAMES NICHOLAS STANTON Defendant	Case No.: AFFIDAVIT OF VERIFICATION TRIAL BY JURY: No
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I James Oliver Romine Jr, depose and state that Attachment F is true and correct to the best of my knowledge, information, and belief and in support of the factual allegations contained within The Complaint.

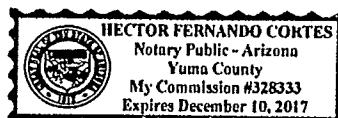


Dated this 22 day of February 2016
 James Oliver Romine Jr.
 12494 Ironwood Dr.
 Yuma, Arizona 85367

Sworn to and subscribed before
 me this 22nd day of February 2016.



NOTARY PUBLIC



When you can name yourself literally *anything* on Steam, it's impossible to know who is a legitimate developer and who isn't, as we've seen with the case of Faker-ECC. Apparently you don't need to prove your company's legitimacy or even *existence*, since it's all based on usernames. Here, we've seen it lead to potential legal trouble for the folks who rebranded and accidentally defamed a completely different studio.

Case 2:16-cv-00604-JJT Document 1-1 Filed 03/04/16 Page 13 of 36

James Oliver Romine Jr. Pro Se Litigant
12494 Ironwood Dr.
Yuma, Arizona 85367
928-276-1844
jromine2445@gmail.com

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

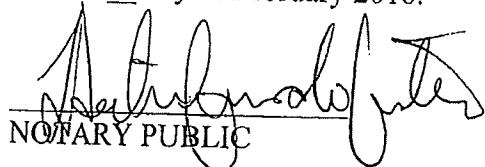
JAMES OLIVER ROMINE JR. Plaintiff	Case No.:
v.	AFFIDAVIT OF VERIFICATION
JAMES NICHOLAS STANTON Defendant	TRIAL BY JURY: No

I James Oliver Romine Jr, depose and state that Attachment 6 is true and correct to the best of my knowledge, information, and belief and in support of the factual allegations contained within The Complaint.

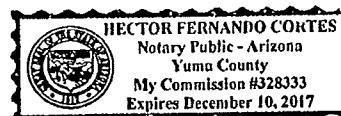


Dated this 12 day of February 2016
James Oliver Romine Jr.
12494 Ironwood Dr.
Yuma, Arizona 85367

Sworn to and subscribed before
me this 22nd day of February 2016.



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The screenshot shows the 'CONTACT' section of the e2Games website. At the top, there's a navigation bar with links for 'PRODUCTS', 'SERVICES', and 'CONTACT'. Below the navigation, there are three rows of developer portraits, each with a name, title, and a small bio. To the right of the developer portraits are social media icons for Facebook and Twitter. At the bottom, there are sections for 'ADDRESS', 'BUSINESS', and 'CUSTOMER SUPPORT'.

CONTACT

PRODUCTS
LET'S SEE WHAT WE HAVE

SERVICES
CHECK WHAT WE DO

CONTACT
MEET US, FIND US

Developers

Portrait	Name	Title	Bio
	Piotr Wątrucki	CEO Game Producer	Game Producer
	Jakub Traczyk	Lead Game Designer	Game Designer
	Jakub Jamiol	Game Dev	Game Dev
	Mardin Macharzewski	Game Writer	Game Writer
	Hubert Bibrowski	Game Tester Engineer Coder	Game Tester Engineer Coder
	Michał Tomaka	Game Designer	Game Designer
	Piotr Kowalski	Programmer	Programmer
	Piotr Roswag	Game Designer	Game Designer
	Jerzy Sokołowski	Game Designer	Game Designer
	Dorota Muzyńska	Game Designer	Game Designer
	Rafał Majzer	Artist Technical Artist	Artist Technical Artist
	Daria Wildermann-Spala	Artist	Artist

ADDRESS

EDO GAMES Sp. z o.o.
NIP / VAT: PL632659244
REGON: 112481416
KRS: 0000546727
Województwo: Śląskie
Zakwaterowanie: 1 729 009 09 71

BUSINESS

If you're interested in inquiries
please contact:
b2b@e2games.com

CUSTOMER SUPPORT

If you experience a problem
with download, install,
testing or using our products or
services please contact:
support@e2games.com

Case 2:16-cv-00604-JJT Document 1-1 Filed 03/04/16 Page 15 of 36

James Oliver Romine Jr. Pro Se Litigant
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 Yuma, Arizona 85367
 928-276-1844
 jromine2445@gmail.com

**IN THE UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF ARIZONA**

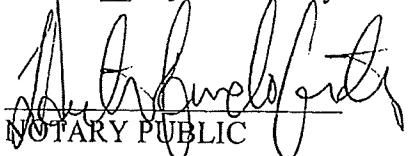
JAMES OLIVER ROMINE JR. Plaintiff v. JAMES NICHOLAS STANTON Defendant	Case No.: AFFIDAVIT OF VERIFICATION TRIAL BY JURY: No
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I James Oliver Romine Jr, depose and state that Attachment H is true and correct to the best of my knowledge, information, and belief and in support of the factual allegations contained within The Complaint.

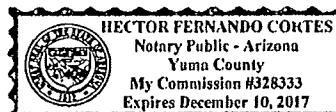


Dated this 12 day of February 2016
 James Oliver Romine Jr.
 12494 Ironwood Dr.
 Yuma, Arizona 85367

Sworn to and subscribed before
 me this 22nd day of February 2016.



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ADDRESS

BUSINESS

PRESS

CUSTOMER SUPPORT

ECC GAMES Sp. z O.O.
NIP / VAT: PL5252599944
REGON: 147481416
KRS: 0000540727
Wysokość Kapitału
Zakładowego 800000,00 Zł

For business related enquiries
please contact:
b2b@eccgames.com

For press related enquiries
please contact:
press@eccgames.com

If you experience a problem
with downloading, installing,
buying or using our products or
services please contact:
support@eccgames.com

Office:
ul. Mierosławskiego 23
01-567 Warsaw
POLAND



Case 2:16-cv-00604-JJT Document 1-1 Filed 03/04/16 Page 17 of 36

James Oliver Romine Jr. Pro Se Litigant
12494 Ironwood Dr.
Yuma, Arizona 85367
928-276-1844
jromine2445@gmail.com

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

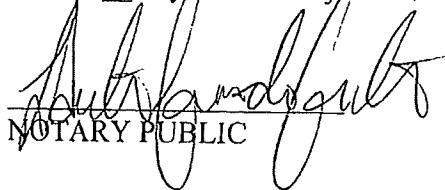
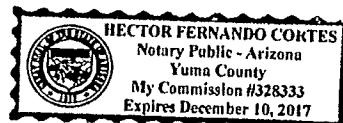
JAMES OLIVER ROMINE JR. Plaintiff	Case No.: AFFIDAVIT OF VERIFICATION TRIAL BY JURY: No
v. JAMES NICHOLAS STANTON Defendant	

I James Oliver Romine Jr, depose and state that Attachment 1 is true and correct to the best of my knowledge, information, and belief and in support of the factual allegations contained within The Complaint.



Dated this 22nd day of February 2016
James Oliver Romine Jr.
12494 Ironwood Dr.
Yuma, Arizona 85367

Sworn to and subscribed before
me this 22nd day of February 2016.


NOTARY PUBLIC

When you can name yourself literally *anything* on Steam, it's impossible to know who is a legitimate developer and who isn't, as we've seen with the case of Faker-ECC. Apparently you don't need to prove your company's legitimacy or even *existence*, since it's all based on usernames. Here, we've seen it lead to potential legal trouble for the folks who rebranded and accidentally defamed a completely different studio.

Someone on Twitter asked me how they "got away" with calling themselves ECC Games. The fact is, they didn't have to "get away" with anything, at least not as far as Steam is concerned. Once again, Valve's lack of oversight makes it easy to just call yourself ECC Games, regardless of who is *actually* allowed to trade under that name.

Digital Homicide's official channels have maintained radio silence for months, seeming to operate solely through these sockpuppet companies. Being as sly as the Wet Bandits, however, it hasn't taken long for the Internet to dig up their latest sleazy shenanigans.

At some point, this "studio" is going to have to realize it is neither talented enough to become a producer of good games, nor clever enough to trick us into believing it is.

That's not going to happen today though, and its recent chicanery may lead it into very real legal trouble.

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jromine2445@gmail.com

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

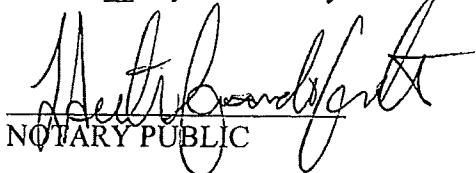
JAMES OLIVER ROMINE JR. Plaintiff v. JAMES NICHOLAS STANTON Defendant	Case No.: AFFIDAVIT OF VERIFICATION TRIAL BY JURY: No
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I James Oliver Romine Jr, depose and state that Attachment K is true and correct to the best of my knowledge, information, and belief and in support of the factual allegations contained within The Complaint.

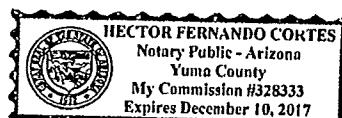


Dated this 22 day of February 2016
James Oliver Romine Jr.
12494 Ironwood Dr.
Yuma, Arizona 85367

Sworn to and subscribed before
me this 22nd day of February 2016.



NOTARY PUBLIC



<input checked="" type="checkbox"/>	Applicant's Serial Number:	X
<input checked="" type="checkbox"/>	www.uspto.gov/brandflow/	
OHM™ Trademark		
<p>Serial Number of the Application: 510470839 Roll in the hole Status: Registered (2012-10-09) Date of the Registration: 03/04/2014</p> <p>Date of filing of the application: 2012-10-25</p> <p>Entered Registration date of the registration of the mark: 2011-12-28</p> <p>Language(s) of the application: English</p> <p>Description of the mark while the mark is represented in standard characters: Roll in the hole</p> <p>Indication referring to the nature of kind of mark: Industrial</p> <p>Indication referring to the nature of kind of mark: Word</p> <p>Name and address of the applicant: Piotr Karczuk Balield, Toruń 85-050, PL</p> <p>Name and address of the representative: JAZZINKA INWESTYCJI KANCELARIA PATENTOWA Warszawa 02-165, PL</p> <p>Indication of the effect that the mark has acquired distinctive character in trade: Base</p> <p>The International Classification of Goods and Services for the Purposes of the Registration of Marks (Nice Classification) and the list of goods and services classified according to it: 9. Scientific, technical, surveying, photographic, cinematographic, optical, measuring, testing, calculating, computing, comparing, checking, inspecting, monitoring, apparatus and instruments; Apparatus and instruments for conducting, switching, transmitting, accumulating, regulating or controlling electrically; Apparatus for recording, transmission or reproduction of sound or images; Magnetic data carriers, recording discs, automated vending machines, and mechanisms for coin-operated apparatus; Cash registers, calculating machines, data processing equipment and computers; Fire-extinguishing apparatus; Recorded computer software; Computer game programs; computer programs (downloadable software); recorded computer programs, magnetic data media</p> <p>28. Games and playthings; Gymnastic and sporting articles not included in other classes; Decorations for Christmas trees; Games and playthings; Gymnastic and sporting articles not included in other classes; play balloons, swimming pools (play articles); explosive fireworks (Christmas tree(s)); stabilizers; playing cards; counter for games; dice, flats, pokers, far meads, back, backgammon, checkers, chess, cards, dominoes (play); board games</p> <p>41. Education; Providing of training; Entertainment; Sporting and cultural activities; Games services produced online via computer networks; arranging competitions (lectures or entertainment)</p>		
 OHM™ Trademark		

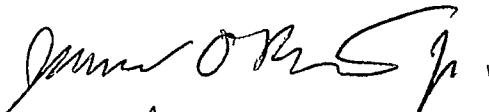
Case 2:16-cv-00604-JJT Document 21-1 Filed 03/04/16 Page 21 of 36

James Oliver Romine Jr. Pro Se Litigant
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jromine2445@gmail.com

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

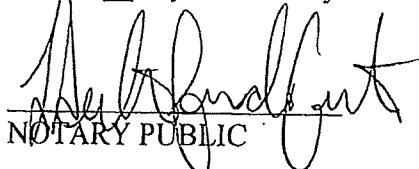
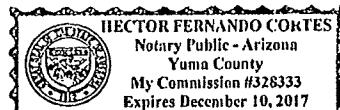
JAMES OLIVER ROMINE JR. Plaintiff	Case No.:
v.	AFFIDAVIT OF VERIFICATION
JAMES NICHOLAS STANTON Defendant	TRIAL BY JURY: No

I James Oliver Romine Jr, depose and state that Attachment M is true and correct to the best of my knowledge, information, and belief and in support of the factual allegations contained within The Complaint.



Dated this 12 day of February 2016
James Oliver Romine Jr.
12494 Ironwood Dr.
Yuma, Arizona 85367

Sworn to and subscribed before
me this 2nd day of February 2016.


NOTARY PUBLIC

status/647005008819437568

Jim Sterling (@JimSterling) · 24 Sep 2015

According to the email, this ECC Games is pursuing legal action against Digital Homicide for using its name. Not enough popcorn on Earth.

RETWEETS 59 LOVES 392

4:09 AM - 24 Sep 2015

Mhykul (@Spasmatt) · 24 Sep 2015
@JimSterling The plot thickens..

Nick Piers (@NickPiers) · 24 Sep 2015
@JimSterling I've said it once, I'll say it again: Digital Homicide is the gift that keeps on giving. Because they're idiots.

Jonathan McCabe (@MoistChange) · 24 Sep 2015
@JimSterling HIT THE LEVER

Robert Koganov (@TH3xR34P3R) · 24 Sep 2015
@JimSterling Oh this is going to be a good episode when you make it lol

John Sinderman (@Sinderman) · 24 Sep 2015
@JimSterling I can't even. Can we be sure Digital Homicide isn't some sort of brilliant performance art troupe?

Show more

Attachment M

Case 2:16-cv-00604-JJT Document 1 Filed 03/04/16 Page 23 of 36

James Oliver Romine Jr. Pro Se Litigant
12494 Ironwood Dr.
Yuma, Arizona 85367
928-276-1844
jromine2445@gmail.com

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

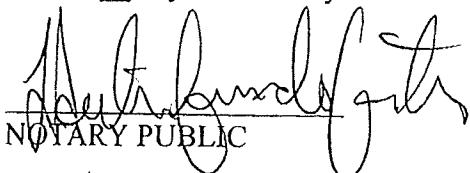
<p>JAMES OLIVER ROMINE JR. Plaintiff</p> <p>v.</p> <p>JAMES NICHOLAS STANTON Defendant</p>	<p>Case No.:</p> <p>AFFIDAVIT OF VERIFICATION</p> <p>TRIAL BY JURY: No</p>
--	---

I James Oliver Romine Jr, depose and state that Attachment N is true and correct to the best of my knowledge, information, and belief and in support of the factual allegations contained within The Complaint.

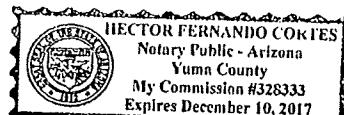


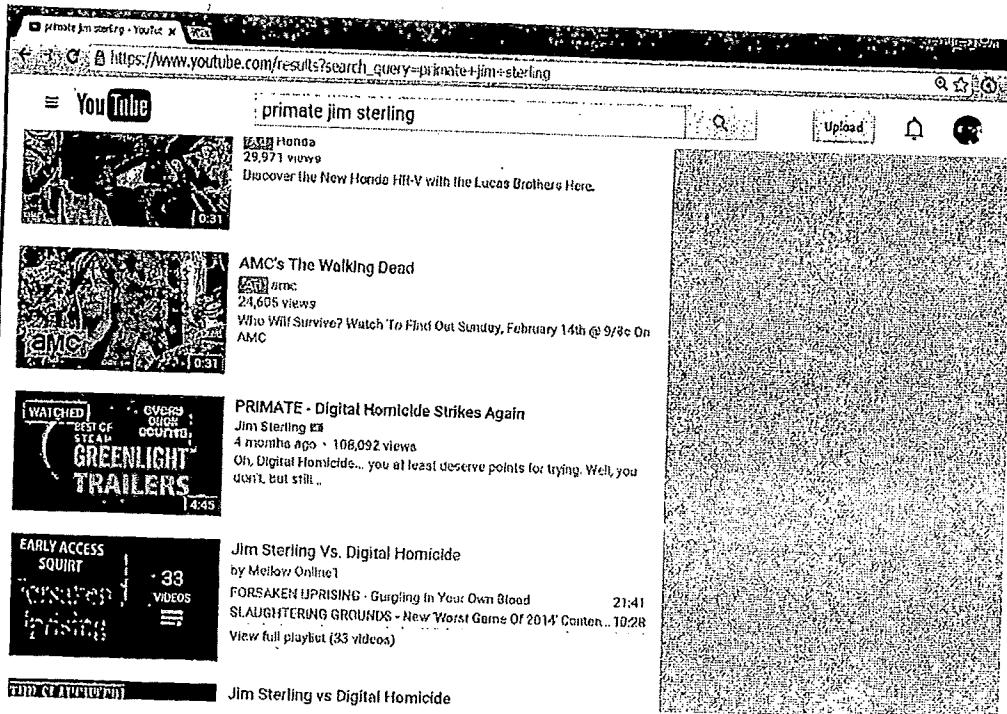
Dated this 12 day of February 2016
James Oliver Romine Jr.
12494 Ironwood Dr.
Yuma, Arizona 85367

Sworn to and subscribed before
me this 22nd day of February 2016.



NOTARY PUBLIC





Attachment N

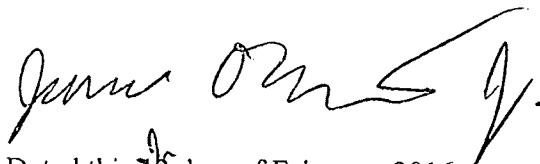
Case 2:16-cv-00604-JJT Document 21-1 Filed 03/04/16 Page 25 of 36

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jromine2445@gmail.com

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

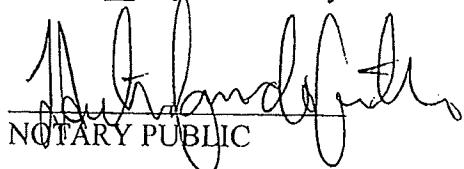
<p>JAMES OLIVER ROMINE JR. Plaintiff</p> <p>v.</p> <p>JAMES NICHOLAS STANTON Defendant</p>	<p>Case No.:</p> <p>AFFIDAVIT OF VERIFICATION</p> <p>TRIAL BY JURY: No</p>
--	---

I James Oliver Romine Jr, depose and state that Attachment O is true and correct to the best of my knowledge, information, and belief and in support of the factual allegations contained within The Complaint.

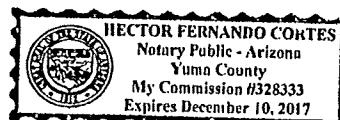


Dated this 12 day of February 2016
James Oliver Romine Jr.
12494 Ironwood Dr.
Yuma, Arizona 85367

Sworn to and subscribed before
me this 22nd day of February 2016.



NOTARY PUBLIC



Jim Sterling (@JimSterling) · 24 Sep 2015

Jesus Christ, I just got an email from ECC Games saying they're NOT the ECC Games Digital Homicide named itself after. This is weeeeird.

26 RETWEETS 161 LIKES

4:08 AM - 24 Sep 2015

Reply Retweet Like More

Franklin J Gomes (@FranklinJGomes) · 24 Sep 2015

@JimSterling Next thing is DH publishing games under the name Konami

Reply Retweet Like More

Jake (@Nakamuruke) · 24 Sep 2015

@JimSterling so, they're either lying or Digital Homicide decided to disguise(?) themselves in plain sight

Reply Retweet Like More

Kanthes (@McKanthes) · 24 Sep 2015

@JimSterling So there's 2 ECC Games? Legit ECC and Digital Homicide ECC?

Reply Retweet Like More

Decentsauce (@Decentsauce) · 24 Sep 2015

@JimSterling Wait... So they blame you for giving them a bad name but don't care if they try to ruin someone else's reputation?

Reply Retweet Like More

Garrett Mullikin (@Thamusicalman78) · 24 Sep 2015

@JimSterling Well. That can't be good.

Reply Retweet Like More

Michael Hanley (@MichaelHanley18) · 24 Sep 2015

@JimSterling so your saying digital homicide is not just doing unity asset store

Case 2:16-cv-00604-JJT Document 27 Filed 03/04/16 Page 27 of 36

James Oliver Romine Jr. Pro Se Litigant
 12494 Ironwood Dr.
 Yuma, Arizona 85367
 928-276-1844
 jromine2445@gmail.com

**IN THE UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF ARIZONA**

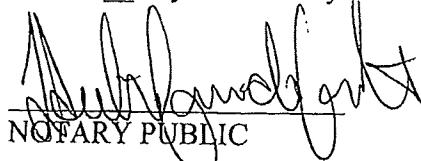
JAMES OLIVER ROMINE JR. Plaintiff v. JAMES NICHOLAS STANTON Defendant	Case No.: AFFIDAVIT OF VERIFICATION TRIAL BY JURY: No
---	--

I James Oliver Romine Jr, depose and state that Attachment Q is true and correct to the best of my knowledge, information, and belief and in support of the factual allegations contained within The Complaint.

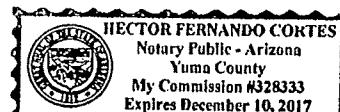


Dated this 22 day of February 2016
 James Oliver Romine Jr.
 12494 Ironwood Dr.
 Yuma, Arizona 85367

Sworn to and subscribed before
 me this 22 day of February 2016.



NOTARY PUBLIC



Twill Onger

Ad-Fee: Account [Zwift](#)

59 4:19

Monetize [Edit](#)

VENTURE OUT FOR A GREAT DEAL

15% Rebate

[View Details](#)

Important: XenoPixelStudies.com has NOTHING to do with the bitter developer (strongly rumored to be Digital Hamidide) who recently attempted a character assassination via a Tumblr blog called "Tim Flips The Bird"; (<http://xenopixelstastic.tumblr.com/>)

It's come to my attention that some people have been sending messages to the owners of XenoPixelStudies.com and XenoPixelStudies.co.us - two sites owned by a small group of uninvited students who are NOT related to the "Van Rattis" character who has been trying to cause trouble under the handle of @xenopixelstudies

The real XenoPixel Studies (the students) have been receiving harassment, something I've already had to directly ask some of you to STOP DOING.

Again, I ask:

PLEASE STOP HARASSING PEOPLE ON MY BEHALF.

This is an EXCELLENT example of why it's a bad idea. Due to what is clearly an individual with a grudge misusing an existing洁白 name to attack me, some innocent people have been caught in the crossfire and I'm currently apologizing to them privately over what a select few of you have done.

I hope the people give me, and I love seeing the word spread when I'm a target of bullsh!t, as it happens a lot and I know it's a pain in the ass. But leave it support and spreading of awareness. Please please PLEASE do not get personal with developers, try to find their personal info and send them threatening or hateful emails, or anything like that. It makes all of you, it makes me, look like bad people. We're better than that like the so-called Van Rattis.

Thank you.

[Reply](#) [Report Post](#)

www.twinkler.com/share/15mb4

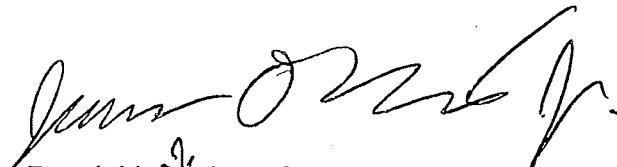
Case 2:16-cv-00604-JJT Document 1 Filed 03/04/16 Page 29 of 36

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928-276-1844
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**IN THE UNITED STATES DISTRICT COURT
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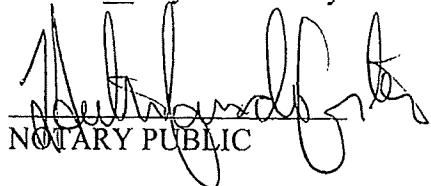
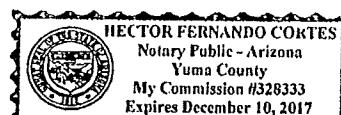
JAMES OLIVER ROMINE JR. Plaintiff	Case No.:
v.	AFFIDAVIT OF VERIFICATION
JAMES NICHOLAS STANTON Defendant	TRIAL BY JURY: No

I James Oliver Romine Jr, depose and state that Attachment R is true and correct to the best of my knowledge, information, and belief and in support of the factual allegations contained within The Complaint.



Dated this 22 day of February 2016
James Oliver Romine Jr.
12494 Ironwood Dr.
Yuma, Arizona 85367

Sworn to and subscribed before
me this 22nd day of February 2016.


NOTARY PUBLIC

Case 2:16-cv-00604-JJT Document 37 Filed 03/04/16 Page 30 of 36

Do you think UN regulation of the internet is really a bad thing? Given how poorly many countries handle their legal systems over the internet (particularly America), wouldn't it be a benefit if they just revised the agreement?

The UN thing is so amazingly overblown. It will not "censor the Internet" and the things I've read about Anita Sarkeesian having the power to get people arrested is unbelievably delusional. I think it's a good thing that the UN is looking into tracking online abuse and harassment, and I'd say the same thing of Google's recent efforts too. The only people who have anything to be afraid of there are, well, abusers and harassers.

Anybody thinking it's to SOPA and PIPA are being ludicrous, and showcasing their complete lack of aptitude for the politics they're repeatedly dabbling in while claiming they hate politics being involved in everything.

2 days ago 5 people like this

Jim, why do you feel it was necessary to out FCC games as Digital Homicide? It's clear that with the new identity, these guys wanted to start anew and leave the past behind. They can still be criticized, sure, but I think it's spineless to bring their past reputation into it if it's not relevant.

Yeah it was, because Digital Homicide is more than just a bad developer. It's had a history of shady and dishonest behavior, behavior it was continuing under its new name. The very fact it was damaging the reputation of another company entirely is bad enough, to say nothing of its continued efforts to push games through Greenlight via unsavory means.

I will not deny the pleasure I take in sticking it to them, but their name is mud for a reason, and people deserve to know who's really selling them products.

2 days ago 5 people like this

Were you going to share the reason why Mojang took down tailed? I read that on twitter earlier and haven't found any follow-up.

I will, yes, but currently it's not something I can share. I'm chomping at the bit to talk about it, and will do so soon as I can. It's potentially unipostion material, to boot.

2 days ago 5 people like this

Considering the decision by Ubisoft to include a trans person in the new AC, I'm guessing the new inquisition is going to be talking about representation of social and ethnic groups in video games, am I close? (I assume ethnic groups because of the picture of Vass.) It is more distinctly tied to Vass and similar things.

2 days ago 2 people like this

Isn't it funny how some people can't comprehend that a male might be interested in female rights so they have to come up with a "his wife/gf makes him say that!" story just to prevent their narrow minds from exploding? Good thing none of that is real.

Step 1: Find a woman to blame.
Step 2: Dribble.

2 days ago 4 people like this

not a question but in response to the question about nippie theater and audience enjoyment.

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**IN THE UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF ARIZONA**

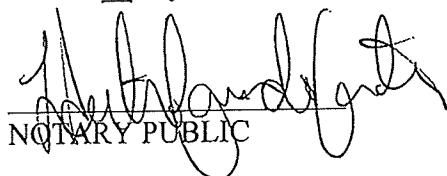
JAMES OLIVER ROMINE JR. Plaintiff v. JAMES NICHOLAS STANTON Defendant	Case No.: AFFIDAVIT OF VERIFICATION TRIAL BY JURY: No
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I James Oliver Romine Jr, depose and state that Attachment u is true and correct to the best of my knowledge, information, and belief and in support of the factual allegations contained within The Complaint.

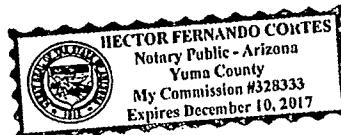


Dated this 12 day of February 2016
 James Oliver Romine Jr.
 12494 Ironwood Dr.
 Yuma, Arizona 85367

Sworn to and subscribed before
 me this 22nd day of February 2016.



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Case 2:16-cv-00604-JJT Document 1 Filed 03/04/16 Page 32 of 36

The screenshot shows a Steam community forum page for the game 'Cat Simulator'. The top navigation bar includes links for 'Store Page', 'Search', and 'Community'. Below the navigation, there are tabs for 'All', 'Discussions', 'Screenshots', 'About', 'Statistics', 'Videos', 'News', 'Guides', and 'Reviews'. The main content area displays a list of discussions, each with a thumbnail, title, number of messages, and a brief description.

Discussion	Thumbnail	Title	Messages	Description
<input checked="" type="checkbox"/> Selling soul		Selling soul	84	Jim Nolin? Fier Than A Bentegon Whiter
<input checked="" type="checkbox"/> Express		Express	3	Ain't Nothin' Fier Than A Bentegon Whiter
<input checked="" type="checkbox"/> Refrigerator paper to pin up positive reviews?		Refrigerator paper to pin up positive reviews?	31	Peter Offer
<input checked="" type="checkbox"/> Would be better...		Would be better...	3	PS3/PS4/Xbox360/XboxOne
<input checked="" type="checkbox"/> Asset Flipping Outrage		Asset Flipping Outrage	3	Children At Large
<input checked="" type="checkbox"/> Someone actually made a telecane in like 4 hours		Someone actually made a telecane in like 4 hours	3	The Purple Edition
<input checked="" type="checkbox"/> WTF in nested skin		WTF in nested skin	2	Yikes
<input checked="" type="checkbox"/> How to get this game COMPLETELY FOR FREE! (if you wish so)		How to get this game COMPLETELY FOR FREE! (if you wish so)	15	Lessons
<input checked="" type="checkbox"/> Not a completed cat simulator without its sleeping, just sayin...		Not a completed cat simulator without its sleeping, just sayin...	3	Sleeping
<input checked="" type="checkbox"/> Gaming		Gaming	1	Asses a flight!
<input checked="" type="checkbox"/> What happened?		What happened?	1	Jim Starting Video Discussion
<input checked="" type="checkbox"/> Astar		Astar	1	BORANGU
<input checked="" type="checkbox"/> PainAssassins		PainAssassins	1	Jumpscare Cat Simulator
<input checked="" type="checkbox"/> HuntingHousewife		HuntingHousewife	3	Recycling publicly available assets doesn't constitute us a game
<input checked="" type="checkbox"/> D_Game		D_Game	1	Fake Review review
<input checked="" type="checkbox"/> Ashley		Ashley	1	Selling Telecane Services
<input checked="" type="checkbox"/> Perfected PS4		Perfected PS4	6	Perfected PS4

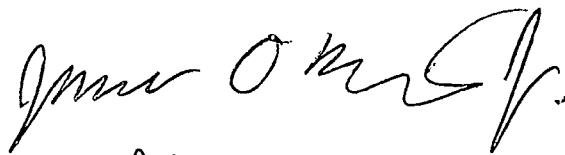
Case 2:16-cv-00604-JJT Document 1 Filed 03/04/16 Page 33 of 36

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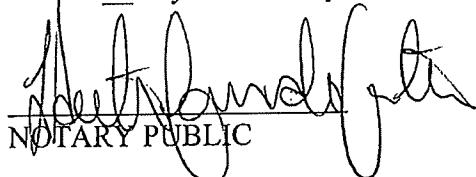
<p>JAMES OLIVER ROMINE JR. Plaintiff v. JAMES NICHOLAS STANTON Defendant</p>	<p>Case No.: AFFIDAVIT OF VERIFICATION TRIAL BY JURY: No</p>
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I James Oliver Romine Jr, depose and state that Attachment V is true and correct to the best of my knowledge, information, and belief and in support of the factual allegations contained within The Complaint.

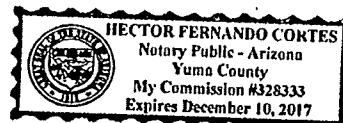


Dated this 22 day of February 2016
James Oliver Romine Jr.
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Sworn to and subscribed before
me this 22nd day of February 2016.



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steamcommunity.com/app/393350/discussions/#p2

Cat Simulator

STEAM® STORE COMMUNITY ABOUT SUPPORT

Show 15-30 of 63 entries < 1 2 3 4 5 6 > Search discussions

[Start a New Discussion](#)

	Author	Date	Replies	Views	Comments
<input checked="" type="checkbox"/> JimStealingZoid	Jim Stealing Zoid Video	Feb 14 @ 7:25am	24	5,545	5,545
<input checked="" type="checkbox"/> Derschmeide	Speedy	Feb 14 @ 7:25am	24	5,545	5,545
<input checked="" type="checkbox"/> AssetsUsedInThisGame	Assets used in this game are used ILLEGALLY	Feb 14 @ 7:25am	24	5,545	5,545
<input checked="" type="checkbox"/> Tadeusz	Project CATS	Feb 14 @ 7:25am	24	5,545	5,545
<input checked="" type="checkbox"/> eliascout	This exists because?	Feb 14 @ 7:25am	24	5,545	5,545
<input checked="" type="checkbox"/> ImpulsionShowering	Impulsion showering	Feb 14 @ 7:25am	24	5,545	5,545
<input checked="" type="checkbox"/> Karpogen	Karpogen	Feb 14 @ 7:25am	24	5,545	5,545
<input checked="" type="checkbox"/> RayNow...	Ray Now...	Feb 14 @ 7:25am	24	5,545	5,545
<input checked="" type="checkbox"/> jahmard955	jahmard955	Feb 14 @ 7:25am	24	5,545	5,545
<input checked="" type="checkbox"/> THEREISNOCATSINTHISGAME	THERE IS NO CATS IN THIS GAME	Feb 14 @ 7:25am	24	5,545	5,545
<input checked="" type="checkbox"/> Vende	Vende	Feb 14 @ 7:25am	24	5,545	5,545
<input checked="" type="checkbox"/> ProjectCATS	Project CATS' second by Vnde, the Artist	Feb 14 @ 7:25am	24	5,545	5,545
<input checked="" type="checkbox"/> 75% positive reviews?	75% positive reviews?	Feb 14 @ 7:25am	24	5,545	5,545
<input checked="" type="checkbox"/> Karpogen	Karpogen	Feb 14 @ 7:25am	24	5,545	5,545
<input checked="" type="checkbox"/> Who voted for this?	Who voted for this?	Feb 14 @ 7:25am	24	5,545	5,545
<input checked="" type="checkbox"/> TheWeebsSpace	TheWeebsSpace	Feb 14 @ 7:25am	24	5,545	5,545
<input checked="" type="checkbox"/> How much money was spent paying for positive reviews?	How much money was spent paying for positive reviews?	Feb 14 @ 7:25am	24	5,545	5,545
<input checked="" type="checkbox"/> Es	Es	Feb 14 @ 7:25am	24	5,545	5,545
<input checked="" type="checkbox"/> What they're saying is...	What they're saying is...	Feb 14 @ 7:25am	24	5,545	5,545
<input checked="" type="checkbox"/> Karpogen	Karpogen	Feb 14 @ 7:25am	24	5,545	5,545
<input checked="" type="checkbox"/> It didn't even give me a ban reason	It didn't even give me a ban reason	Feb 14 @ 7:25am	24	5,545	5,545
<input checked="" type="checkbox"/> ProjectCatsFan	ProjectCatsFan	Feb 14 @ 7:25am	24	5,545	5,545
<input checked="" type="checkbox"/> I can't find project cats on the store	I can't find project cats on the store	Feb 14 @ 7:25am	24	5,545	5,545
<input checked="" type="checkbox"/> mafuskinsrectangle	mafuskinsrectangle	Feb 14 @ 7:25am	24	5,545	5,545
<input checked="" type="checkbox"/> Opinions please.	Opinions please.	Feb 14 @ 7:25am	24	5,545	5,545
<input checked="" type="checkbox"/> Guest	Guest	Feb 14 @ 7:25am	24	5,545	5,545
Showing 15-30 of 63 entries < 1 2 3 4 5 6 >					
Per page: 15 30					

Case 2:16-cv-00604-JJT Document 1 Filed 03/04/16 Page 35 of 36

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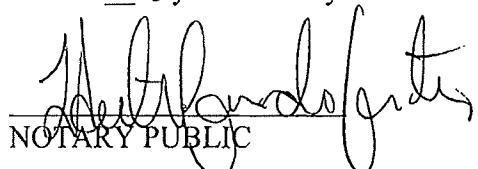
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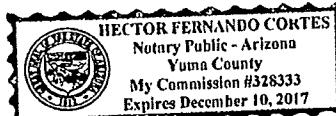
<p>JAMES OLIVER ROMINE JR. Plaintiff</p> <p>v.</p> <p>JAMES NICHOLAS STANTON Defendant</p>	<p>Case No.:</p> <p>AFFIDAVIT OF VERIFICATION</p> <p>TRIAL BY JURY: No</p>
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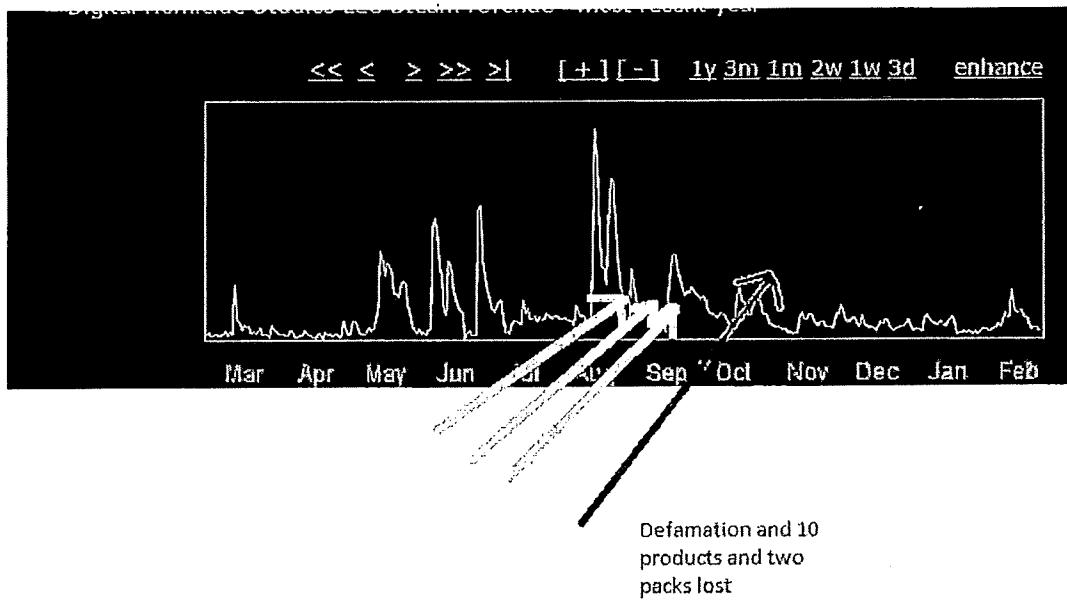
I James Oliver Romine Jr, depose and state that Attachment 2 is true and correct to the best of my knowledge, information, and belief and in support of the factual allegations contained within The Complaint.


Dated this 22 day of February 2016
James Oliver Romine Jr.
12494 Ironwood Dr.
Yuma, Arizona 85367

Sworn to and subscribed before
me this 22nd day of February 2016.


NOTARY PUBLIC





The 3 White arrows express the addition of products to submission stage by Every Click Counts and The Plaintiff's other Trade Names. This is initial standard product staging before being incorporated.

The Grey Arrow indicates the loss of these products and advertising efforts.